

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMANZAR,	*	
	*	
Plaintiff,	*	
	*	
v.	*	Civil Action No.
	*	1:19-cv-01301-WMR
	*	
LATASHA TRANSRINA KEBE et al.,	*	
	*	
Defendants.	*	

**DEFENDANT KEBE’S BRIEF IN SUPPORT OF
MOTION TO FILE DOCUMENTS UNDER SEAL**

Ms. Kebe has moved this Honorable Court, pursuant to Fed. R. Civ. P. 5.2(d) and 26(c), the parties’ Consent Protective Order (Dkt. 53), and Section II.J. to Appendix H of this Court’s Local Rules, for an Order permitting her to file certain documents under seal. Ms. Kebe submits the foregoing Brief in support of her motion.

This Court is permitted, for good cause, to shield the disclosure of confidential information from the public record. *See* Fed. R. Civ. P. 26(c). “The federal district courts derive their authority to seal or otherwise deny public access to documents or proceedings from Rule 26(c) of the Federal Rules of Civil Procedure.” *In re Estate of Martin Luther King, Jr., Inc. v. CBS, Inc.*, 184 F. Supp. 2d 1353, 1362 (N.D. Ga. 2002).

The parties have a Consent Protective Order in this case providing for the filing of documents under seal. (*See* Dkt. 53). The documents listed below contain information designated by Plaintiff as “Confidential.” The documents listed below are either documents designated by Plaintiff as “Confidential” pursuant to the parties’ Consent Protective Order or Documents designated by Ms. Kebe as “Confidential” because they contain references to, or excerpts from, documents Plaintiff has designated “Confidential”. As Plaintiff has designated the information as “Confidential,” it is Plaintiff’s burden to establish good cause for sealing. *See* Section II.J.2.e. to Appendix H of this Court’s Local Rules.

Ms. Kebe respectfully requests permission to file the following documents under seal for the reasons set forth below:

1. The following supporting documents to Kebe’s Response to Plaintiff’s Motion for Summary Judgment:
 - a. Defendant Kebe’s Response to Plaintiff’s Statement of Material Facts In Support of Plaintiff’s Motion for Summary Judgment because it quotes directly from, or references, documents that have been designated as “Confidential”;

- b. Defendant Kebe's Brief Opposing Plaintiff's Motion for Summary Judgment because it quotes directly from, or references, documents that have been designated as "Confidential";
- c. Defendant Kebe's Statement of Additional Material Facts in Support of Brief Opposing Plaintiff's Motion for Summary Judgment (hereinafter referred to as "Kebe's ASMF" because it quotes directly from, or references, documents that have been designated as "Confidential";
- d. Exhibit A to Kebe's ASMF: Declaration of Sadeer Sabbak (hereinafter referred to as "Declaration") because it quotes directly from, or references, documents that have been designated as "Confidential";
- e. Exhibit 1 to Declaration: true and correct copies of documents bates numbered Kebe 010-013, 015, 018, 093-100, 106-107, 127-136, 145-147, 187-203, 261-263, 366-367, 370, 373, 376-377, 413-319, 422, 424, 426-428, 436-444, 4470447, and CARDI_000787 because it includes documents that have been designated as "Confidential";
- f. Exhibit 2 to Declaration: excerpts from the 11/19/20 Deposition of Latasha Kebe because it contains Confidential information;
- g. Exhibit 3 to Declaration: excerpts from the 11/30/20 Deposition of Latasha Kebe because it contains Confidential information;

h. Exhibit 4 to Declaration: excerpts from the 11/29/20 Deposition of Cheick Kebe because it contains confidential information.

For the foregoing reasons, Ms. Kebe respectfully requests that this Court grant her motion to file documents listed above under seal.

CERTIFICATION AS TO FONT

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14 point, a font and point selection approved by the Court in Local Rule 5.1(C).

Respectfully submitted this 25th day of January, 2021.

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